

Exhibit I



Deposition of:
Robert Ritchie , Ph.D.

August 4, 2017

In the Matter of:

**In Re: Bard IVC Filters Products
Liability**

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Page 52

1 Q. But you haven't studied what Kuo found?

2 A. No.

3 Q. Okay. That's all I wanted to ask you about
4 Hyde. So now we will go to Mrs. Jones. And her
5 report is 6009.

6 She is an Eclipse filter?

7 A. Correct.

8 Q. We previously talked about Eclipse
9 modifications involving electropolishing --

10 A. Correct.

11 Q. -- in your last deposition.

12 A. Right.

13 Q. And you agree that that modification could
14 improve surface conditions and the centerless grind
15 issues that had been in the previous iterations of
16 filter, true?

17 A. It will do that, yes.

18 Q. Okay. Where did Mrs. Jones' fracture?

19 A. It was an arm fracture.

20 Q. Do you know where?

21 A. Well, again, I don't know precisely where,
22 but I would imagine that it would be in the same
23 location, within a millimeter of the sheath, because
24 that's where all the arm fractures that I've seen
25 seem to occur.